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5 IN THE UNITED STATES DISTRICT COURT
6 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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8 IN RE: UBER TECHNOLOGIES, INC.,
9 PASSENGER SEXUAL ASSAULT
10 LITIGATION

Case No. 23-md-03084-CRB

11 This Document Relates to:
12 ALL CASES
13

**DECLARATION OF ROOPAL P. LUHANA
IN SUPPORT OF PLAINTIFFS' PORTION
OF JOINT LETTER REGARDING
DEFENDANTS' PRODUCTION OF
HYPERLINKED DOCUMENTS**

Judge: Honorable Lisa J. Cisneros

1 I, Roopal Luhana, hereby declare as follows:

2 1. I am a partner of Chaffin Luhana LLP, an attorney licensed in the State of New
3 York and duly admitted to practice before this Court, representing Plaintiffs in the above caption
4 action.

5 2. I submit this declaration in support of Plaintiffs' portion of the parties' Joint Letter
6 Regarding Defendants' Production of Hyperlinked Documents.

7 3. Attached hereto as Exhibit B is a true and accurate copy of the document produced
8 as bates no. UBER_JCCP_MDL_000149960.

9 4. Attached hereto as Exhibit C is a true and accurate copy of the document produced
10 as bates no. UBER_JCCP_MDL_000224112.

11 5. Attached hereto as Exhibit D is a true and accurate copy of the document produced
12 as bates no. UBER_JCCP_MDL_000010815.

13 6. Attached hereto as Exhibit E is a true and accurate copy of the document produced
14 as bates no. UBER_JCCP_MDL_000046654.

15 7. Attached hereto as Exhibit F is a true and accurate copy of the document produced
16 as bates no. UBER_JCCP_MDL_000046698.

17 8. Attached hereto as Exhibit G, the "Bates/Control #" column contains a true and
18 accurate list of documents identified by Plaintiffs to Uber on January 21, 2025 pursuant to the
19 parties' Joint Status Report. ECF No. 2115. Additionally, Exhibit G contains the document type
20 based on metadata Uber provided ("type" Column), the date Uber produced the document to
21 Plaintiffs ("Date Produced" Column) and a true and accurate description to the best of Plaintiffs'
22 belief and understanding of the deficiencies within each document related to hyperlinks
23 ("Deficiencies" column).

24 9. Attached hereto as Exhibit H is a true and accurate copy of the declaration of
25 Douglas Forrest.

26 I declare under penalty of perjury under the laws of the United States of America that the
27 foregoing is true and correct.

28 Executed this 31st Day of January, 2025 in Brooklyn, New York.

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/s/ Roopal P. Luhana
Roopal P. Luhana